

2.0 ALTERNATIVES

2.1 BACKGROUND

The General Services Administration (GSA) issued a Notice of Intent (NOI) in April, 2004 to prepare a Draft Environmental Impact Statement (DEIS) associated with the construction of facilities for the Los Angeles Field Office Headquarters of the Federal Bureau of Investigation (FBI). The NOI identified a Proposed Action and three alternatives:

- **Proposed Action.** In addition to the existing building, construct new facilities for the FBI on the 11000 Wilshire Boulevard site that would provide approximately 937,000 gross square feet (GSF) of building space and 420,000 gross square feet of garage building that would provide for 1,200 secured parking spaces. The project would occur in two phases over a 10-year period. Since the issuance of the NOI, GSA conducted a search for alternative site locations based on GSA and FBI requirements.
- **Renovate and Expand Existing Facility Alternative.** Renovate the 11000 Wilshire Boulevard building for sole use by the FBI and relocate existing tenants to other locations.
- **Build-to-Suit Lease Alternative.** Find a developer to provide a site and construct suitable building(s) for the FBI and then lease to GSA.
- **No Action Alternative.** This alternative would keep part of the Los Angeles FBI Field Office Headquarters operations at 11000 Wilshire Boulevard and other parts of the operations at several leased facilities as noted in Section 1.

During the initial scoping process, several comments suggested that locations other than 11000 Wilshire Boulevard should be considered for this project. Thirteen locations were identified during the comment period. Also, as part of the scoping process, the Los Angeles Economic Development Corporation (LAEDC) was contacted and 12 sites were offered for review as potential sites. The general area for consideration of potential sites was identified during the Scoping Meeting as bounded by I-10, I-405, and I-5.

As a result of the extensive comments concerning potential issues at the 11000 Wilshire Boulevard Site during the scoping process, GSA initiated an extended scoping period to gather additional input from interested parties. GSA conducted several Round Table Meetings with interested parties in January, 2005 for the purpose of information exchange. Many of the issues identified during the Round Table Meetings were similar to those identified during the Scoping Meeting. The primary issues identified were: (1) traffic conditions at the Wilshire and I-405 vicinity, and (2) alternative sites should be evaluated for the location of the FBI Los Angeles Field Office Headquarters.

Based on the comments received during the extended scoping process, GSA and the FBI further analyzed the needs of the FBI in terms of geographic location, acreage required for the building site to meet the needs of the FBI, and several other criteria related to FBI security and operations. The FBI provided a delineated area for the location of their facilities along with specific site and facility requirements to GSA in April 2005. This area was identified as the boundary of I-405 on the west, I-10 on the south, I-5 on the east and Magnolia Boulevard (just north of I-101) on the north. This additional information was used by GSA to conduct an evaluation of potential alternative sites.

2.2 ALTERNATIVE SITE EVALUATION

2.2.1 GSA Siting Process

The GSA and the FBI developed criteria for a site location based on security requirements, Federal regulations, and constructability. These siting criteria were included in the advertisements for potential sites.

- To provide the FBI with rapid access to local and regional transportation networks, the site must lie within the interior boundaries of I-405 Freeway on the West, Magnolia Boulevard to the North, the I-5 Freeway to the East, and the I-10 Freeway on the South (See Figure 1-3).
- To meet setback requirements for security and foundation requirements for construction, the site must be relatively flat and consist of a minimum of 10 contiguous buildable acres.
- To minimize its strategic target value, the site can not be located within a one mile radius of any other major Federal, state, or local law enforcement headquarters, be within any normal airport flight pattern area, or lie adjacent to railroad rights of way.
- The site should be located within a prime commercial office district with professional surroundings commensurate with its status.
- By law, the site must be located outside of any designated floodplain.
- To meet the FBI's space requirements, the site must be zoned for office development that permits construction height limitations of not less than 140 feet.

Based on these requirements and FBI mission requirements, GSA advertised a request for sites and also contacted local real estate brokers. Advertisements were placed in the Los Angeles Times and FedBizOpps. The Los Angeles Times advertisements were published three times during the first week of May 2005. The FedBizOpps advertisement was published on April 29, 2005. Both advertisements requested that a response be provided to GSA by May 30, 2005. In addition to the advertisements, 93 individual direct contacts were sent to representatives of the following entities:

- City of Los Angeles (14)
- City of Beverly Hills (6)
- County of Los Angeles (4)
- State of California (8)
- Federal Officials (8)
- Private Land Owners/Developers (29)
- Chambers of Commerce/Business Organizations (6)
- Real Estate Brokerage/Property Management Firms (18)

In response to the advertisements, direct mail contacts and meeting with local officials, there were 35 potential sites identified. GSA staff reviewed each of the 35 sites to determine if they satisfied the siting criteria. The review of the sites did not find any that were acceptable for development of an FBI Los Angeles Field Office Headquarters. The principal reasons that no sites were found acceptable was that none of the sites offered could meet critical criteria of being within the specified delineated area, be located more than one mile away from other law enforcement agencies, and containing 10 acres of contiguous space. Appendix B provides further details on the alternative site evaluations.

While these advertising activities were proceeding, GSA initiated a separate process to locate potential sites that might meet the project criteria. In accordance with Executive Order 12072, several meetings were held with local officials from December, 2004 to May, 2005. Section 1-103 of Executive Order 12072 states that, "Except where such selection is otherwise prohibited, the process for meeting Federal space needs in urban areas shall give first consideration to a centralized community business area and adjacent areas of similar character, including other specific areas which may be recommended by local officials." No potential sites were identified that were suitable for consideration. GSA received a letter

from the City of Los Angeles confirming that consultation had been completed and no viable sites were available (Appendix B).

2.3 ALTERNATIVES EXAMINED BUT NOT CONSIDERED FUTHER

Under NEPA, alternatives can be eliminated from further consideration when they are found to be neither feasible nor prudent. In general, an alternative is not considered feasible if it is neither reasonable nor practical to implement. An alternative is generally not considered prudent when it does not meet the identified purpose and need, or the environmental consequences are excessive. Alternatives that are eliminated are not considered further in Chapter 4 of this EIS.

2.3.1 Renovate and Expand the Existing Facility Alternative

Renovating the existing building and expanding the FBI spaces to become the only tenant in the building was considered as a potential alternative. The existing building is in need of extensive major renovations and updates. The building, constructed in 1969, does not have adequate ventilation capacity for special communications areas, lacks suitable building power distribution for modern computers and electronic equipment, has unsuitable water service, and does not meet current seismic design standards for the region. In addition, as identified in Section 1.2, this building does not meet the requirements for FBI in terms of the square foot area per floor, column spacing, suitable under the floor utility corridors, floor-load capacity for storage, blast resistant design, and security. As a result, this alternative was not considered for further analysis.

2.3.2 Build-to-Suit Lease Alternative

The Build-to-Suit Lease alternative is a process by which GSA would acquire a site by an assignable purchase option to be assigned to a developer who would purchase the site and then construct and lease the buildings to the United States.

The Federal Management Regulations (successor to the Federal Property Management Regulations), Subchapter C-Real Property, Part 102-73-Real Estate Acquisition, provide policies that apply to GSA's Public Building Service. In accordance with this regulation, when Federal agencies seek to acquire space, they should first seek space in Government-owned and Government-leased buildings. If suitable Government-controlled space is unavailable, Federal agencies must acquire real estate and related services in an efficient and cost effective manner.

Leasing is a desirable solution when the government needs only a small amount of space or only for a short time. However, as stated in Sections 1.2 and 1.3, Purpose and Need, FBI is seeking 937,000 gross square feet of office, storage and maintenance areas plus secure parking spaces for its permanent headquarters in Southern California. Since a lease is for a finite term of years, a lease cannot meet the need for permanence by FBI. Further, FBI's specialized requirements, i.e., large floor plates, wide column spacing, automotive and radio maintenance facility, cannot be met in typical commercial office space. Other unique requirements, i.e., redundant air conditioning, blast resistant walls, electronic dampening sensors, secured parking, etc are not typically found in commercial office space. Such items are cost-prohibitive due to the requirement by lessors to amortize them over the term since any future tenants would have no need for them.

Further, due to the changing mission needs and security requirements, FBI needs flexibility in the layout of its space, security setback requirements and parking. In a lease, the Government would be subject to a lessor's approval for these items as well as the potential flexibility of the building, site and surrounding neighborhood. The Wilshire campus, which consists of 28 acres, is sufficiently large to provide flexibility in meeting the requirements of FBI and is without equal in terms of its potential to be made

into a secure development with controlled perimeter access and generous stand-off distances from public areas.

Further, GSA advertised for sites meeting the requirements set forth in the GSA Site Selection Guide (GSA, 2003). This process was conducted during May-July 2005 and is described in Section 2.2 and Appendix B. Of the 35 potential sites that were brought to the attention of GSA during that process, no sites were identified that would satisfy the requirements of the GSA and FBI.

As a result of reviewing the build-to-suit lease alternative, the lack of potential alternative sites as noted in Section 2.2.3, and adherence to the Federal Management Regulations, the build-to-suit lease alternative was not considered for further analysis because it could not meet the Purpose and Need as identified in Section 1.3.

2.3.3 Existing Building and One New Building and Parking Garage Alternative

This alternative would place the FBI in two buildings, the existing 11000 Wilshire Boulevard office tower and one new building, plus secured parking for 1,200 vehicles. This scenario was reviewed by the FBI and GSA and determined not to satisfy the requirements established in the Section 1.2, Purpose and Need, and noted in Section 2.3.1 above as related to the 11000 Wilshire Boulevard building. In addition, there would be technology coordination and compatibility issues between the existing building and new building. Additional site security would be required for both buildings to meet FBI requirements and still provide public access to the U.S. Post Office and the cafeteria. As a result of these findings, this alternative was not considered for further analysis.

2.4 ALTERNATIVES CARRIED FORWARD FOR DETAILED ANALYSIS

Federal construction on Federally owned- property at 11000 Wilshire Boulevard is the preferred site to satisfy the purpose and need of the FBI Field Office Headquarters. Two “build” alternatives on the preferred site have been identified that satisfy the conditions specified in the Purpose and Need. These alternatives will be carried forward for detailed analysis in this EIS. The No Action Alternative does not satisfy the purpose and need; however, pursuant to NEPA, it is carried forward as the baseline against which potential impacts of the alternatives can be measured.

2.4.1 No Action Alternative

This alternative will maintain the existing conditions. The FBI Los Angeles Field Office Headquarters will remain split between 11000 Wilshire Boulevard and 11 leased facilities. The FBI operations would continue to operate in spaces that do not accommodate their requirements for how they need to function in the 21st Century. The geographically split operations are inefficient and hinder effective responses for day-to-day activities and emergency operations.

Under this alternative, the existing non-FBI tenants will remain at 11000 Wilshire Boulevard. Based on the need for Federal office space in the region, the mix of tenants may fluctuate over time. Current and planned renovations will occur as needed for a building that is 35 years old.

The No Action Alternative would include the physical facilities listed below:

- Retain Existing 11000 Wilshire Office Tower (561,559 GSF)
- Retain Existing Post Office (32,000 GSF)
- Retain Existing Cafeteria (23,000 GSF)
- Retain Existing Auto Radio Maintenance Facility (A/RMF) and Garage (192,000 GSF)
- Retain Existing Parking
 - Secured Garage for FBI (440 spaces)

- Secured Surface Parking for FBI (196 spaces)
- Unsecured Surface Parking (1,255 spaces, including loading dock)

Table 2-1 identifies the facilities and employees that would occur under the No Action Alternative. The population projections are for a future maximum number of employees based on a mix of FBI and non-FBI tenants.

2.4.2 Alternative 1: Mixed Use - Existing Facilities + Two New Buildings + New Parking Garage

This alternative includes retaining the current facilities located at 11000 Wilshire Boulevard, with the exception of the existing parking garage, which would be demolished, and a reduction in surface parking spaces. New facilities for the FBI Los Angeles Field Office Headquarters will include office space, evidence storage areas, automotive/radio maintenance facility (A/RMF), a parking garage providing 1,200 secured parking spaces and 750 surface parking spaces. The new facilities would provide the security and operational requirements for the FBI as identified in Section 1.0, Purpose and Need.

The development of the FBI spaces would occur in two phases as detailed in Table 2-2. Once Phase 1 is completed, the FBI will relocate from the existing 11000 Wilshire facilities to the new office spaces. Phase 1 would also provide for 850 secured parking garage spaces, the A/RMF, and evidence storage area. Phase 2 would provide the remainder of the office space, 350 secured parking garage spaces and 750 surface parking spaces. As the FBI off-site leases expire, employees will be relocated to the new facilities. Total employees on-site for the FBI would increase from approximately 700 to 1,640 when the buildings are filled. The total employees on the 11000 Wilshire Federal campus could reach a potential maximum of 4,092.

The physical facilities that would ultimately be located on the Federal campus at 11000 Wilshire Boulevard include:

- Retain & Renovate Existing 11000 Wilshire Office Tower for non-FBI tenants (561,559 GSF)
- Retain Existing Post Office (32,000 GSF)
- Retain Existing Cafeteria (23,000 GSF)
- Demolish Existing Parking Garage and A/RMF Building (192,000 GSF)
- Build New Office Building and Evidence Storage Space for the FBI (937,000 GSF total) Plus a Garage for 1,200 Secured Parking Spaces in Two Phases
 - Phase 1 (FY 2012) = 764,500 GSF (467,000 GSF office + 297,500 GSF of garage):
 - 230,000 GSF Office
 - 190,000 GSF Storage
 - 47,000 GSF A/RMF
 - 297,500 GSF Secured Garage Parking (850 spaces)
 - 375 Secured Surface Parking Spaces
 - 1,255 Remaining Unsecured Surface Parking Spaces
 - Phase 2 (FY 2017) = 592,500 GSF (470,000 GSF office + 122,500 GSF garage)
 - 470,000 GSF Office
 - 122,500 GSF Secured Garage Parking (350 spaces)
 - 375 Secured Surface Parking Spaces

**Table 2-1
NO ACTION ALTERNATIVE**

Buildings / Facilities	Gross Sq. Ft.	Number Employees	Secured Garage Parking Spaces	Secured Surface Parking Spaces	Unsecured Surface Parking Spaces	Tenant Mix
Existing Buildings / Facilities						
Office Tower	561,559	1,880	0	0	1,049	Multiple
U.S. Postal Service	32,000	142	0	0	205	USPO
Cafeteria	23,000	10	0	0	1	Vendor
Secured Parking Garage and Auto/Radio Maintenance Facility (A/RMF)	192,000	35	440	196	0	FBI
Totals	808,559	2,067	440	196	1,255	

**Table 2-2
ALTERNATIVE 1**

Buildings / Facilities	Gross Sq. Ft.	Number Employees	Secured Garage Parking Spaces	Secured Surface Parking Spaces	Surface Parking Spaces	Tenant Mix
Existing Buildings / Facilities: (To be renovated for non-FBI tenant use)						
Office Tower	561,559	2,300	0	0	1,049	Non-FBI
U.S. Postal Service	32,000	142	0	0	205	USPO
Cafeteria	23,000	10	0	0	1	Vendor
Secured Parking Garage and Auto/Radio Maintenance Facility (A/RMF)	0	0	0	0	0	
Totals	616,559	2,452	0	0	1,255	
Add: Phase 1 - New Construction For FBI (FY 2012):						
Phase 1 - New Office	230,000	540	0		0	FBI
Phase 1 - New Storage	190,000	65	0		0	FBI
Phase 1 - New ARMF Building	47,000	35	0		0	FBI
Phase 1 - 2/3 of New Secured Parking Garage	297,500	0	850	375	0	FBI
Total Phase 1	764,500	640	850	375	0	
Total On-Site After Completion Phase 1	1,381,059	3,092	850	375	1,255	
Add: Phase 2 - New Construction For FBI (FY 2017):						
Phase 2 - New Office	470,000	1,000	0		0	FBI
Phase 2 - 1/3 of New Secured Parking Garage	122,500	0	350	375	0	FBI
Total Phase 2	592,500	1,000	350	375	0	
Total On-Site After Completion Phase 2	1,973,559	4,092	1,200	750	1,255	

Table 2-2 also identifies the changes from the existing conditions to the completion of Phase 2. This table identifies the number of employees that are currently on the site and the number of Federal employees anticipated on the site at the end of Phase 1 and at the end of Phase 2.

2.4.3 Alternative 2: FBI Only - Two New Buildings + USPO + New Parking Garage

This alternative would result in buildings at the 11000 Wilshire Boulevard campus that would consist of new FBI office and storage buildings, new FBI parking garage, and A/RMF. Once Phase 1 is completed, the FBI will relocate from their existing 11000 Wilshire facilities to the new office spaces. Phase 1 would also provide for 850 secured parking garage spaces, the A/RMF, and evidence storage area. The U.S. Postal Service facilities would remain on the site, but the 17-story existing office tower and the cafeteria building would be demolished.

Phase 2 would provide the remainder of the office space, 350 secured parking garage spaces, and 750 surface parking spaces. As the FBI off-site leases expire employees will be relocated to the new facilities. Total employees on-site for the FBI would increase from 700 to 1,640 when the buildings are filled. This would provide a secure compound for the FBI. The total employees on the 11000 Wilshire Federal campus would be 1,782.

The physical facilities that would ultimately be located on the Federal campus at 11000 Wilshire Boulevard include

- Demolish Existing 11000 Wilshire Office Tower (-561,559 GSF)
- Retain Post Office (32,000 GSF)
- Demolish Existing Cafeteria (-23,000 GSF)
- Demolish Existing Parking Garage and A/RMF (-192,000 GSF)
- Build New Space for FBI (937,000 GSF) in Two Phases
 - Phase 1 (FY 2012) = 764,500 (467,000 GSF office + 297,500 GSF of garage)
 - 230,000 GSF Office
 - 190,000 GSF Storage
 - 47,000 GSF ARMF
 - 297,500 GSF Secured Garage Parking (850 spaces)
 - 205 Remaining Unsecured Surface Parking Spaces
 - Phase 2 (FY 2017) = 592,500 GSF (470,000 GSF office + 122,500 GSF garage)
 - 470,000 GSF Office
 - 122,500 GSF Secured Garage Parking (350 spaces)

Table 2-3 identifies the changes from the existing conditions to the completion of Phase 2. This table identifies the number of employees that are currently on the site and the number of employees anticipated on the site at the end of Phase 1 and at the end of Phase 2.

**Table 2-3
ALTERNATIVE 2**

Buildings / Facilities	Gross Sq. Ft.	Number Employees	Secured Garage Parking Spaces	Secured Surface Parking Spaces	Unsecured Surface Parking Spaces	Tenant Mix
Existing Buildings / Facilities: (Existing Office Tower, ARMF & Cafeteria to be demolished)						
Office Tower (Demolition in Phase 1)	0	0	0	0	0	Demolished
U.S. Postal Service	32,000	142	0	0	205	USPO
Cafeteria (Demolition in Phase 1)	0	0	0	0	0	Demolished
Secured Parking Garage and Auto/Radio Maintenance Facility (A/RMF)	0	0	0	0	0	Demolished
Totals	32,000	142	0	0	205	
Add: Phase 1 - New Construction For FBI (FY 2012):						
Phase 1 - New Office	230,000	540	0	0	0	FBI
Phase 1 - New Storage	190,000	65	0	0	0	FBI
Phase 1 - New ARMF Building	47,000	35	0	0	0	FBI
Phase 1 - 1/2 of New Secured Parking Garage	297,500	0	850	375	0	FBI
Total Phase 1	764,500	640	850	375	0	
Total On-Site After Completion Phase 1	796,500	782	850	375	205	
Add: Phase 2 - New Construction For FBI (FY 2017):						
Phase 2 - New Office	470,000	1,000	0	0	0	FBI
Phase 2 - 1/2 of New Secured Parking Garage	122,500	0	350	375	0	FBI
Total Phase 2	592,500	1,000	350	375	0	
Total On-Site After Completion Phase 2	1,389,000	1,782	1,200	750	205	

2.5 COMPARISON OF ALTERNATIVES

Table 2-4 provides a summary comparison of the alternatives as they relate to the purpose and need presented in Section 1.0.

**Table 2-4
COMPARISON OF ALTERNATIVES WITH REQUIREMENTS IDENTIFIED
IN THE PURPOSE AND NEED**

Purpose & Need	Alternative 1	Alternative 2	No Action
Consolidation of Operations	Yes	Yes	No
Meets Security Setback Requirements	Yes	Yes	Yes
Structural / Floor Column Spacing	Yes	Yes	No
Location Requirements	Yes	Yes	Yes

2.6 SUMMARY

Since the NOI was issued and as a result of an extended scoping process, additional site alternatives were reviewed and new alternatives were developed. The scoping process was extended to include Round Table meetings and other meetings from December 2004 to May 2005 that resulted in input from local citizens, local officials, and Federal officials. While these meetings were occurring, contact was made with representatives of local, state and Federal governments plus real estate brokers and developers to determine if there were potential sites that could meet the needs of GSA and the FBI. An extensive market survey was conducted from May to July, 2005 and no sites capable of meeting the requirements were identified. Therefore, GSA identified that Federal construction on Federal property at 11000 Wilshire Boulevard is the preferred site to satisfy the needs of the FBI Field Office Headquarters.

Several alternatives for the 11000 Wilshire Boulevard site were developed. The screening of alternatives resulted in the elimination of two potential alternatives based on the defined needs of the FBI mission and operations. The alternatives eliminated were: (1) Renovate and Expand the Existing Facility alternative and (2) use the Existing Building and One New Building and Parking Garage alternate. The three alternatives carried forward for analysis are: (1) No Action Alternative, (2) Alternative 1 Mixed Use - Existing Facilities + Two New Buildings + New Parking Garage, and (3) Alternative 2 FBI Only - Two New Buildings + USPO + New Parking Garage.
